

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS MARTIN
TO QUESTION 11
OF PRESIDING OFFICER'S INFORMATION REQUEST NO. 1**

The United States Postal Service hereby files the response of witness Martin (USPS-T-6) to question 11 submitted as part of Presiding Officer's Information Request No. 1, dated December 29, 2011:

Responses to the dwindling number of outstanding questions of POIR 1 are forthcoming.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MARTIN
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11. On Page 12 of her testimony, witness Martin (USPS-T-6) estimates a 13.68 percent reduction in operating miles of plant-to-post office transportation.
- a. Please provide all data and supporting analyses used to determine the average percent reduction.
 - b. Please confirm whether or not all regions are represented in the calculation of the average percent reduction in operating miles. If not, please explain.
 - c. Please confirm that the percent reduction is a simple average of the regions under study. If confirmed, please explain the rationale for using a simple average rather than a weighted average.

RESPONSE:

- (a) The responsive data and analyses have been filed in library references USPS-LR-N2012-1/11 ("Plant to Post Office" spreadsheet), USPS-LR-N2012-1/27 and USPS-LR-N2012-1/NP8.
- (b) Not confirmed. Only 14 AMP studies, analyzing routes from four (4) areas, had been reviewed by my office at the time I finalized my testimony. Please see my response to PR/USPS-T6-12(e). When all of the AMP studies relevant to this docket have been completed, I will update the record to reflect the additional data.
- (c) Confirmed. In preparing my testimony for this docket, I calculated the weighted average percent reduction in operating miles and compared the result to the simple average. I included the simple average in my testimony because, when compared to the weighted average, the simple average was more conservative. A weighted average would have yielded a 14.32 percent reduction in operating miles, as shown in the chart below.

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RESPONSE TO QUESTION 11 (CONT.):

	Plant to Post Office			
Trans Study Site	Less Miles	%Impact		Wgt Avg
Grand Island NE	(136,148)	-10.63%		14,473
Eau Claire WI	(386,872)	-11.92%		46,115
LaCrosse WI	(337,645)	-22.76%		76,848
Rochester MN	(92,281)	-7.64%		7,050
Duluth MN	(315,047)	-18.13%		57,118
Lafayette LA	(398,352)	-30.02%		119,585
Norfolk NE	(264,432)	-19.16%		50,665
Quincy IL	(273,190)	-3.73%		10,190
Owensboro KY	(44,072)	-3.70%		1,631
Campton KY	(115,126)	-54.25%		62,456
Bloomington IN	(38,118)	-1.80%		686
Kalamazoo MI	(1,042,672)	-4.88%		50,841
South FL	(1,101)	-0.05%		1
Lancaster PA	(36,956)	-2.84%		1,048
	Average	-13.68%		-14.32%